REMOVAL SITE EVALUATION RADIOLOGICAL CONTROL UNIT FACILITIES PROJECT SEPTEMBER 1993

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DOE-FN/FERMCO 26 RSE

REMOVAL SITE EVALUATION

RADIOLOGICAL CONTROL UNIT FACILITIES PROJECT

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT
U. S. DEPARTMENT OF ENERGY

SEPTEMBER, 1993

REMOVAL SITE EVALUATION

RADIOLOGICAL CONTROL UNIT FACILITIES PROJECT

INTRODUCTION

The Radiological Control Unit Facilities Project is planned to upgrade change facilities and radiological control points at the FEMP to achieve full compliance with FERMCO's Radiological Controls Manual Implementation Plan. This work will also provide improved contamination and access controls, increased worker efficiency due to reductions in travel time for breaks, minimized waste generation through the use of reusable anti-Cs, and should result in fewer heat related stress incidents.

Control points will be set up at individual contamination compounds to be established in the former process area of the FEMP. These compounds will encompass individual buildings or in some cases groups of buildings. Each compound will be fenced to provide positive ingress and egress control. The compounds will have change facilities, some break areas, and provide controlled access to the radiologically controlled areas. Personnel without the proper level of training or protective clothing will not be able to enter the compound.

Mobile trailers will be used for these change facilities at FEMP locations where buildings or structures are being demolished and involve a substantial number of personnel (including contractors). For buildings with elongated clean-up/demolition schedules and having fewer people working in the area, the change facilities will be portable, modular structures to be placed within the buildings themselves to serve as change facilities/radiological control points.

The specific project scope is comprised of the following items:

- (1) Modular trailer complexes to be initially sited in the approximate locations shown in Figures 1-4 based on the projected schedule of remedial activities. Each complex will be comprised of four modular units which will provide access control points, mens and womens change facilities, restrooms, shower facilities, and a break room. Upon the completion of D&D work in one contamination compound, the use of trailers will allow relocation of change/break facilities to another work area to adequately support cleanup operations elsewhere.
- (2) One single trailer located at Building 8 (Figure 5) to support long term operation of the facility. This will provide access control points and mens and womens change facilities for personnel assigned to ongoing building operations.
- (3) Three portable containment structures to be utilized inside Buildings 5, 6, and 9 for access controls and change facilities in the approximate locations shown in Figures 6-8. A similar structure may also be acquired for Building 78. No running water or break facilities are included with these facilities. The structures will be used to support Safe Shutdown activities at these buildings that are preliminary to D&D activities.



(4) Installation of approximately 7,100 feet of permanent fencing will be undertaken to provide a barrier for positive access control into the established contamination compounds. Approximately 21 vehicle gates will be required to support the movement and control of equipment supporting project work at each compound.

The following wastes, determined to be non-hazardous by process knowledge, are expected to be generated from this project:

- Soil, gravel, and possible concrete for the installation of trailers, their anchoring devices, along with underground utility tie-ins. While a minimum amount of site preparation work is to be done, the amount of these wastes will depend upon specific details in contractor proposals/bids.
- Other non-soil debris (plastic, paper, rubber, cardboard packaging material; possible anti-Cs and miscellaneous project trash).

For Scope Item (3), no construction wastes will be generated for installation of the inside change facilities other than packaging materials and possible radiologically contaminated anti-Cs, gloves, clothing, etc. because the work will not involve any demolition/modifications of existing FEMP buildings.

This Removal Site Evaluation (RSE) has been completed by the Department of Energy (DOE) under authorities delegated by Executive Order 12580 under Section 104 of CERCLA and is consistent with Section 300.410 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This RSE addresses the project involving all radiological control unit facilities. This RSE has been completed to support the decision as to whether the project conditions warrant a removal action. Controls implemented to support this construction activity are also presented in the RSE to demonstrate that the proposed construction will not cause deterioration of the existing site conditions.

SOURCE TERM

Consistent with 40 CFR 300.410(a), the RSE includes a removal preliminary assessment which is based upon readily available information as described in 40 CFR 300.410(c). A RCRA Determination/Radiological Characterization is underway to evaluate contaminant levels in the soil and debris from this project. Prior sampling in the production area has shown some chemical contamination (e.g metals, organics) above detectable levels in soil at the FEMP. Soil and gravel disturbed by this project represent a source of possible releases should they contain radiological or chemical contamination.

Areas in which the change facility trailers are to be placed have been characterized for general radiological contamination levels. These areas are primarily gravel covered with direct readings ranging from non-detectable to 1.5 kdpm/cm² beta-gamma and 0.2kdpm/cm² alpha and removable contamination levels less than MDA. If the gravel is removed or disturbed, the possibility exists for

exposing removable contamination to the environment and creating a pathway for the spread of contamination. Attachment 2 contains typical radiological surveys for the construction area.

EVALUATION OF THE MAGNITUDE OF THE POTENTIAL THREAT

Based on the above information, uranium and chemical contamination from displaced soil and gravel are the sources of threat in the event of a release. To manage the hazards and prevent the spread of contamination, the following controls, among others, will be implemented during construction of the new facilities.

- Excess soil from this project will be managed according to Removal Action 17 criteria. Soil will be backfilled, stockpiled or containerized in accordance with the management criteria specified in the Removal Action 17 work plan.
- Physical barriers will be positioned around the work area to prevent unauthorized access.
- Protective clothing and respiratory protection will be provided for workers, as required.
- Plastic targaulins and bags and appropriate containers will be readily available to contain radiologically contaminated materials, as required.
- Runoff controls will be established, as required.

All activities performed in support of this project will follow applicable site policies and procedures written to control such activities. These procedures include, but are not limited to, the following:

- SSOP-0044, "Management of Soil, Debris, and Waste from a Project" SP-P35-010, "Unrestricted Release of Materials from FMPC"
- Removal Action No. 17, "Improved Storage of Soil and Debris"

Excavation will not be allowed without appropriate radiological controls. During the installation of the change facilities, a Radiological Work Permit will be issued and the work area will be surveyed during and upon completion of work. Clean gravel or other suitable material (per Removal Action 17) will be used to cover any area above controlled area limits.

ASSESSMENT OF THE NEED FOR REMOVAL ACTION

Consistent with Section 40 CFR 300.410 of the NCP, the DOE shall determine the appropriateness of a removal action. Eight factors to be considered in this determination are listed in 40 CFR 300.415 (b)(2). Based on the data presented above, the following one of the eight criteria listed in the NCP applies:

• 40 CFR 300.415(b)(2)(v)

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released

Phase I of Removal Action 17 requires placement on and covering of contaminated soils with a heavy, nonpermeable tarpaulin. The tarpaulins will prevent the spread of contamination and resultant exposure to humans, animals or the food chain.

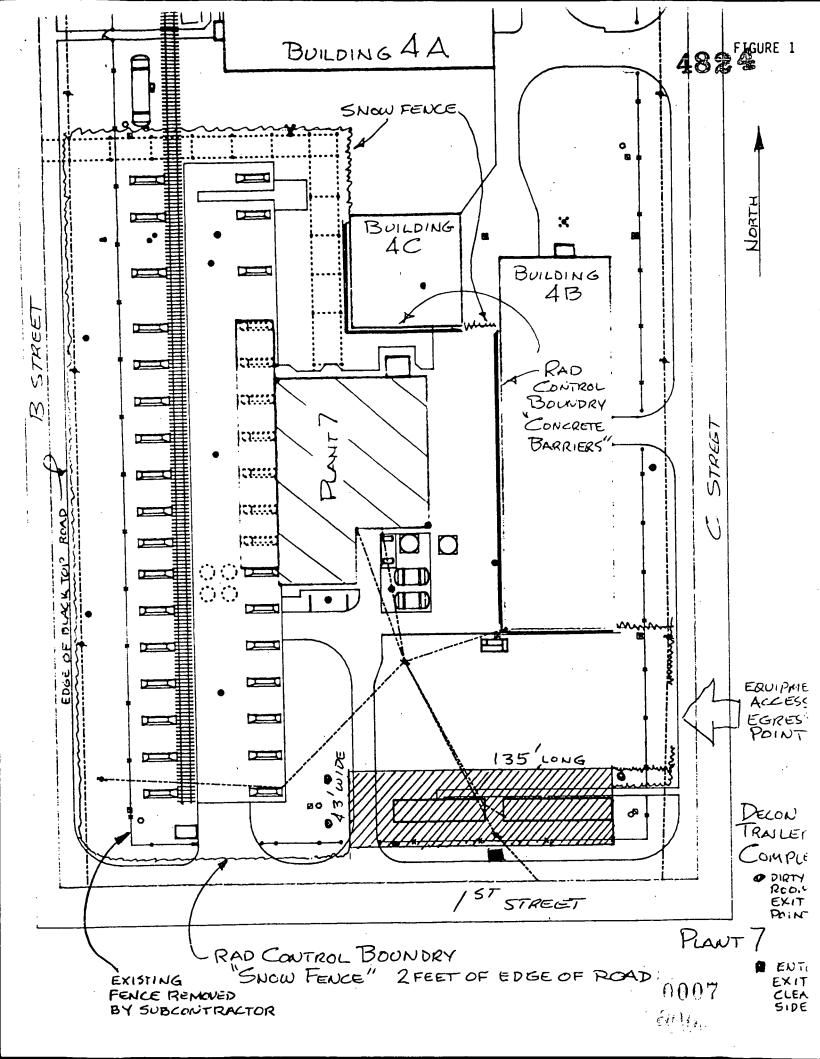
The potential of a release or migration of hazardous substances from these project sites is negligible. The low levels of contamination at these work sites also support the conclusion that any threat resulting from uranium contamination is negligible. Thus, while the above criteria can be applied to the Radiological Control Unit Facilities Project, it does not constitute the need for a removal action.

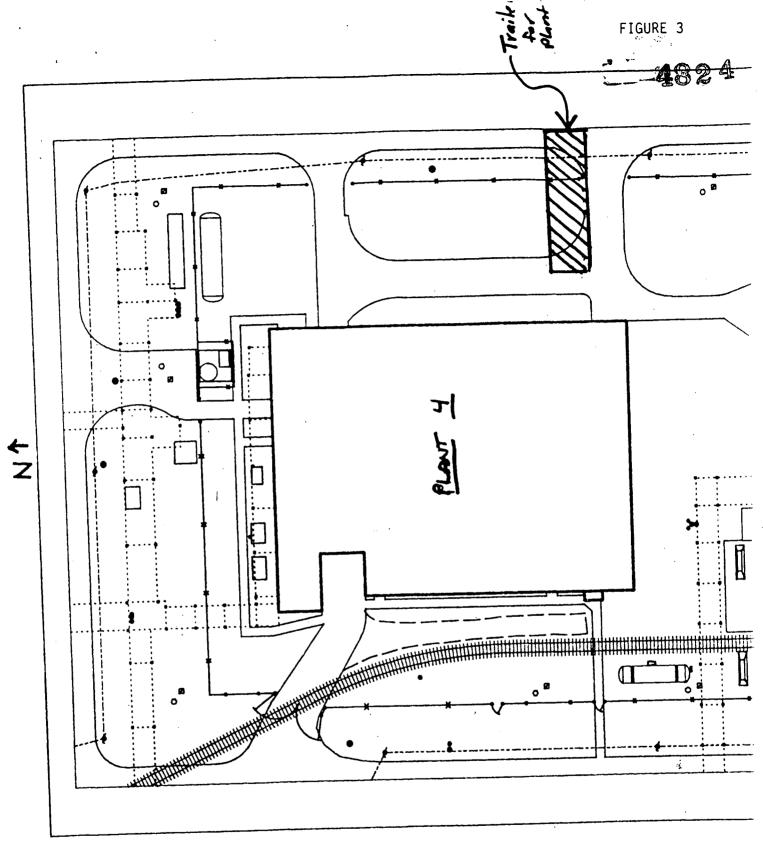
APPROPRIATENESS OF A RESPONSE

Based on the evaluation of all the above factors, it has been determined that a removal action will not be necessary and this project should be continued as a planned construction activity in support of the CERCLA remediation process at the FEMP. Furthermore, the controls planned in conjunction with this construction activity and management procedures established in accordance with Removal Action 17 are adequate to mitigate any hazards to human health, safety, and the environment and to prevent deterioration of existing site conditions.

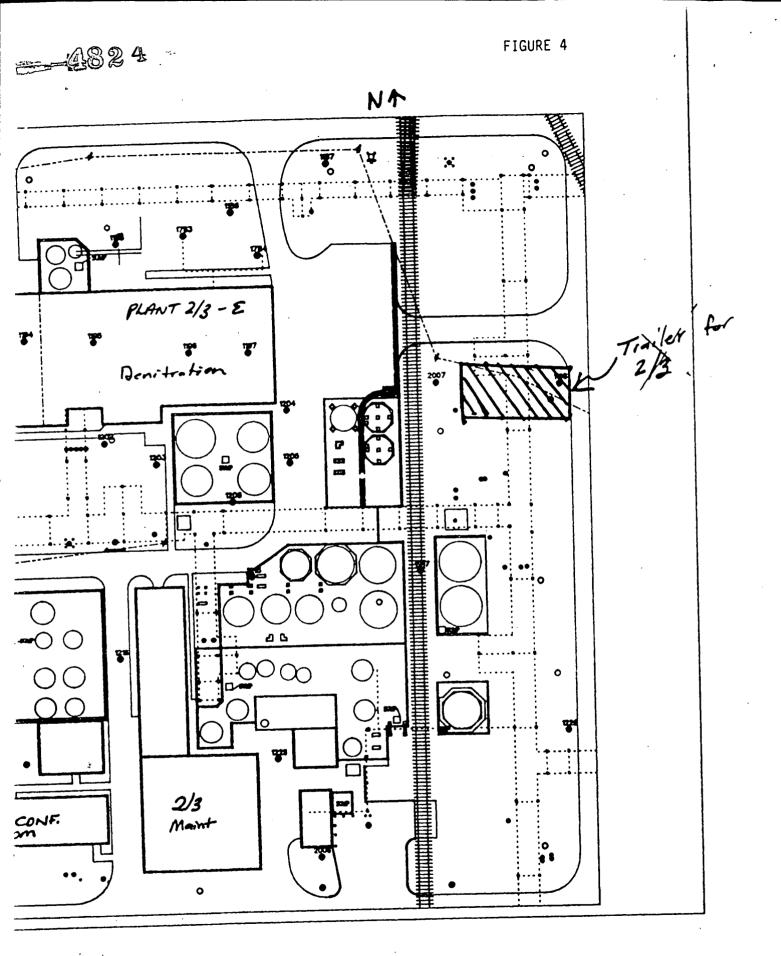


ATTACHMENT 1 LOCATIONS OF CHANGE TRAILERS AND FENCING





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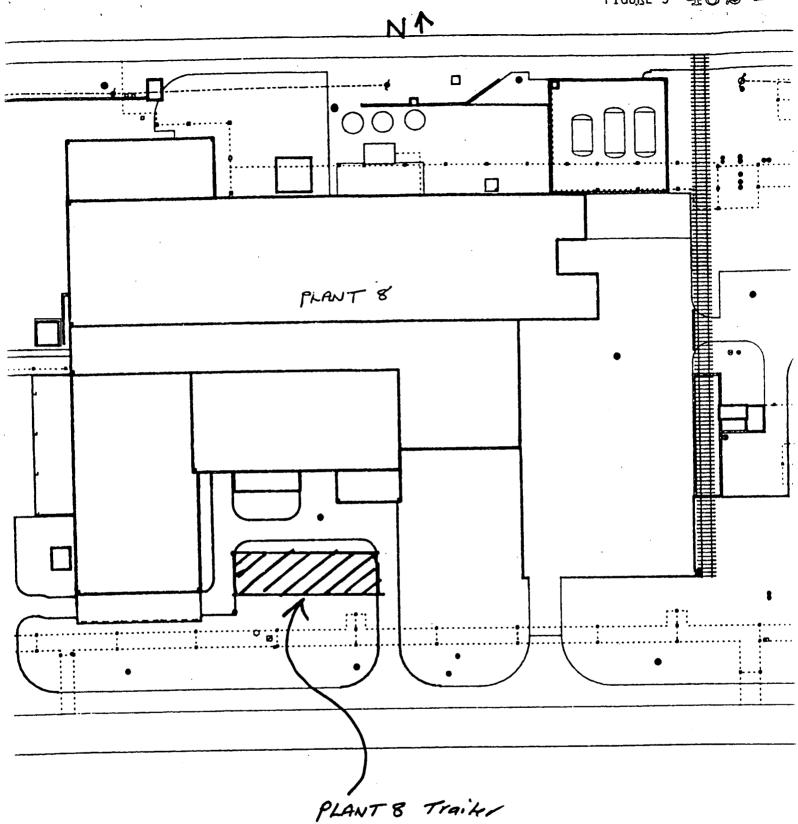
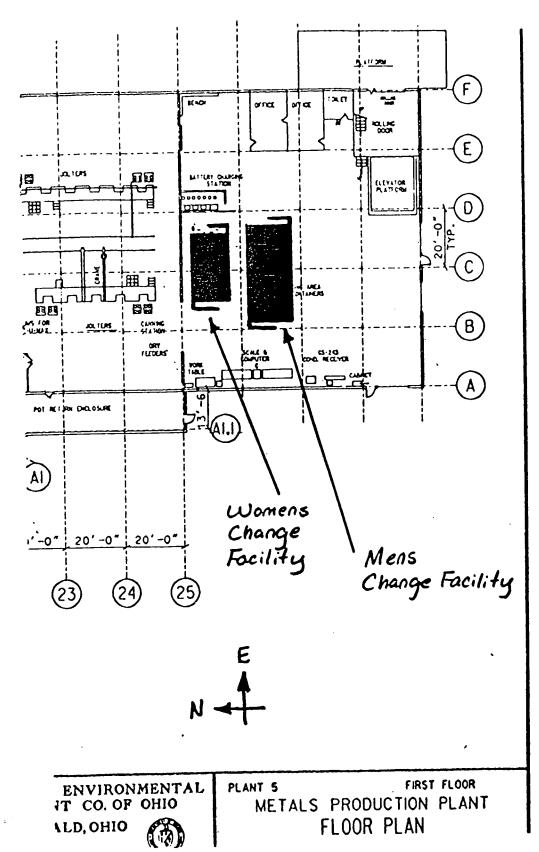


FIGURE 6
LOCATION OF INTERIOR CHANGE FACILITIES FOR PLANT 5



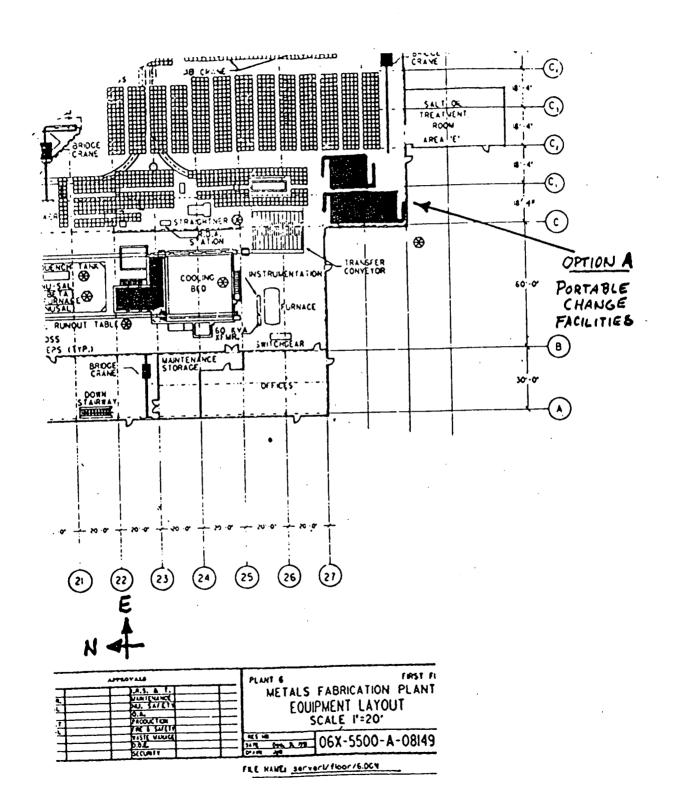
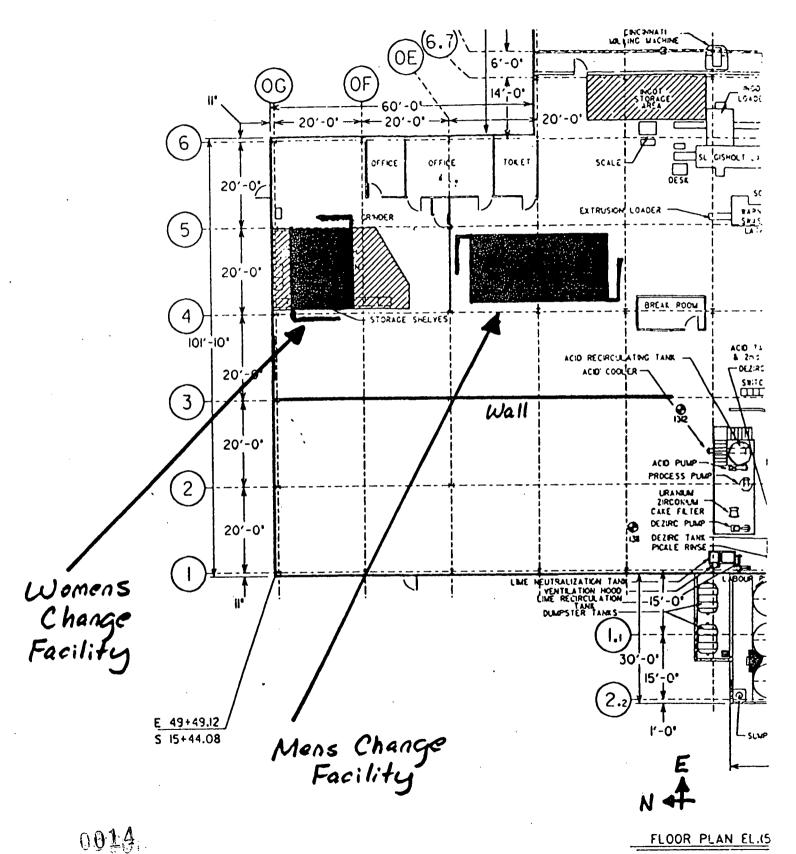
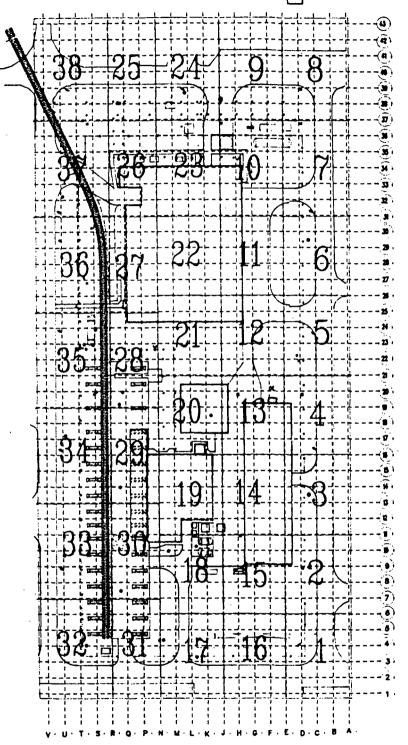


FIGURE 8

LOCATION OF INTERIOR CHANGE FACILITIES FOR PLANT 9



GRID 13 OUTDOOR AREAS AS 4824



ATTACHMENT 2 RADIOLOGICAL SURVEY RESULTS

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INDUSTRIAL RADIOLOGICAL SAFETY & TRAINING - RADIOLOGICAL SAFETY

8:00 ATM RADIOLOGICAL SURVEY REPORT (CONTINUATION SHEET)

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RADIOLOGICAL SURVEY REPORT (CONTINUATION SHEET)

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RADIOLOGICAL SURVEY REPORT (CONTINUATION SHEET)

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74	,					<u> </u>	-	~12		413
SU								~\>		(رم
51								~\	·	22
67								الم		11 L
53	1							~0		\ <u>\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \</u>
54								۷.)	<u> </u>	د.~
55		·						MI		~ >
۶٤								Ci_{Δ}		6/2
87								1.2 k	,	1.5
55								~N		د، م
59								~1>		411
 								ر،م		~!>
90				-				۸,٦		~ \(\(\)
91								~,>		۷,
92		4		-				~\ <u>\</u>	,	~_
93		T10.12, Wall. 1.2	Ar. v 3			-	-			
94					-		+	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	_	~
45								(. ~		~ _
96							-	<u> </u>		1~1
197		\ \ \ \ \ \					عجهي	1 ~13	<u>, </u>	

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INDUSTRIAL RADIOLOGICAL SAFETY & TRAINING - RADIOLOGICAL SAFETY

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RADIOLOGICAL SURVEY REPORT (CONTINUATION SHEET)

	0010			TED DOS		nRem/hr) β/γ	DF ALF	M (BETA-	PM GAMMA
ITEM IUMBER	GRID COORDINATES	DESCRIPTION	CONTACT	β/y CONTACT	<u>у</u> 3 FT.	3 FT.	100 CM ²	PROBE	100 CM ²	PROBE
75		Try - with builton	<u></u>					MO		<u>~0</u>
		1 - 1	. 1					4.2K		~>
99		100 million billion						~5		د، سر
100		(UC), 1-2						~\		<u>~.></u>
121		(Jally), m. 4.						~:>_		~ >
102		1, 1, 1, 2		-				~1)		[N
ا 3		()()() 1 = m. 113						20		~0
1:4		Lucil 1 Can	->	1	-	+		~)		~)
105		luida worklung								41
100		in at East dell				-	 	~)		
157		www.	_		-			\ <u>_\`\</u>	 	12.1
155		Hand is.	_		-			~:)	-	1-2
11.9		LUNU				-		1 ~ 1)	-	<u> ~:></u>
/10		Hand Roil		_		-	4	~\ <u>\</u>	4	100
111		Lall 1 and		<u> </u>				4.2K		
113							1 / N.).	3 . 2 k	mi	>+ ~ 1
113							1010	A 62 K	· M	<u>\</u>
114						_		4.2	Κ	1~ >
								~1)		~.
115								~c		~:
//i		Traile Hitch						~:		
177							10	رد م ا مر	S ML	24 2
115		(col, loss,)						ر ر ه		^
117					1			٤, 2	- 1	N
12.			-					~ .	- 1	~ .
121							_	~ 1		~ `
123	5 44j							4.2		7:
121	500						C	DA • 3		DA CI
12	0026	V					M	DAI • J		1-14

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RADIOLOGICAL SURVEY REPORT (CONTINUATION SHEET) 48 2 11

			CORREC	TED DOS	E RATE (n		DF	PM PHA	DF BETA-C	M
ITEM NUMBER	GRID COORDINATES	DESCRIPTION	CONTACT	β/γ CONTACT	у 3 FT.	β/γ 3 FT.	100 CM ²	PROBE	100 CM ²	PROBE
			CONTACT	30.11,201				~1)		20
125		I www	-		_,			1		CIK
2		,,	-				 	~:)	 	
127		11	-					111		~```
128		Had Soil		-	-		-	1~1)		^.>
129		hile w		ļ			4	NO.	4	C - S
13c		- Aprile oust					MIDA	1614	MIX	2 =
171		Fine () 16				ļ		4.2 K		
132		Twee rost					A.M	1.2K	ACIW.	3.51
		Finit With						4.21		1.8.
.33		file 2.5+					MAA	1.2 K	MIX	3.50
:74		'						4.21		4/in
155		fine post					KISA		1.6	3.5
776					-			د ، ~		41:
177		-,~(L 0 1/ L					6	2 K	1	42.5
775		TENCE SOST				-	4	A.51	6	4 21 1
139		concerte sure-ned la	156				100	- 1		
140		70214 U/L			-		6	ν <u>ί</u>	7	1~1)
141		There ast		_			m.			A 2 K
142	1 .	rungete base						الحريما	1	
11/3		-me w/c				_	1	~ W 1/4 1/2 . 81		12.3
144		Tener -15+					2.2	10 81	< m;	14 2 1
		rangate base					111	,2. 5	K M	91
145		Crock							<u> </u>	,
, lik		1						~ ;)	
11.								~,	>	~.
145								~ 3		~ .
160							$\triangle \epsilon$	197	>	<i>~</i> \:
150							_	~1		~\
15	1	<u> </u>								<u></u>

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RADIOLOGICAL SURVEY REPORT (CONTINUATION SHEET)

			CORREC	TED DOS	RATE (n		DF ALF	M .	BETA-	PM GAMMA
ITEM UMBER	GRID COORDINATES	DESCRIPTION	CONTACT	β/γ CONTACT	<i>у</i> 3 FT.	β/γ 3 FT.	100 CM ²		100 CM2	PROBE
			CONTACT	CONTACT						
51		-16.61						<u>~3</u>		121)
153								دم		100
								~.>		~\
154								~,>_		41K
155								دم		11/
150										~.)
157			- 					(1~1)		
158						-	-	\~? <u>\</u>		121)
159				-			ļ	1~D	-	N,
165				ļ	<u> </u>	ļ	· -	~N		Lik
111							ļ	N-V	-	41
								~:>		1~1
1:2								.~\ <u>\</u>		~~
163								(;~		141
114					 			~1)		4
115			\rightarrow		 				1	
							ļ	+*X		
168					 			NO	}-	
						_				_
	7 - 7 . 4	Bringthone								
		100di/#3								
	10012/	1/10:17								
ļ	S/W= 1193	s/w=77119								
	19/1/1/2 2.92	Cyl. dux = 2.92		_						
	Din = C	13/4g= 60								
	F= . C9	17: 25							-	
	MO4= 222	MDA = 400				_	_			
	0028									
					.					

